

# EXHIBIT A

1 SUPREME COURT: ALL COUNTIES

2 WITHIN THE STATE OF NEW YORK

3  
4  
5 IN RE: NEW YORK CITY

6 ASBESTOS LITIGATION

7  
8  
9 DEPOSITION

10 UNDER ORAL

11 EXAMINATION

12 OF

13 JOHN BEREI

14  
15  
16 This Document Applies To:

17 JOHN BEREI

1 A. Sometimes.

2 Q. Were you -- strike that.

3 Were these people using pipe  
4 covering in your presence?

5 A. Yes.

6 Q. Was that the half circular  
7 type pipe wrap that went around pipes?

8 A. Yes.

9 Q. Did it have to be cut or  
10 manipulated in your presence?

11 A. Yes. Very dusty.

12 Q. And do you know the name,  
13 trade name, or manufacturer of any  
14 of the pipe covering that was  
15 installed on the oil tanker in your  
16 presence?

17 A. Yes.

18 Q. What manufacturers' names do  
19 you recall?

20 A. On the pipe covering.

21 Q. I'm talking about the pipe  
22 covering. The insulation itself.

23 A. Yes.

24 Q. Does the name Johns-Manville  
25 sound familiar to you?

1 A. Yes.

2 Q. Are they one of the  
3 manufacturers of insulation on the  
4 ship?

5 A. Yes.

6 Q. What about UNARCO? Did you  
7 ever see any pipe covering or cement  
8 from UNARCO?

9 A. I don't recall.

10 Q. What about Owens Illinois?

11 A. Yes.

12 Q. What about Owens Corning?

13 A. Yes.

14 Q. What about Philip Carey?

15 A. I don't recall.

16 Q. Are there any other names of  
17 manufacturers of the pipe covering  
18 or insulation that you recall?

19 A. On the pumps. And the valves.

20 Q. I'm talking about just the  
21 insulation itself.

22 DEFENSE COUNSEL: Move to strike  
23 nonresponsive portion.

24 BY MR. BROMBERG:

25 Q. All I'm asking you about is the

1 A. Asbestos sheet.

2 BY MR. BROMBERG:

3 Q. And did you have occasion to observe  
4 these gaskets?

5 A. Yes. Many times.

6 Q. And any work on these gaskets  
7 would have been done by others. Is that  
8 right?

9 A. Yes.

10 Q. Do you know the trade name or  
11 manufacturer's name of any of the gaskets  
12 that you observed?

13 A. Cranite. Goodyear.

14 Q. Do you ever recall seeing any  
15 gaskets made by Garlock?

16 A. Garlock. Yes.

17 Q. Were there any other products  
18 that you believe contained asbestos  
19 that you either worked with personally  
20 or were used in your vicinity when  
21 you were in the Navy at the naval  
22 base, that we haven't already talked  
23 about?

24 A. Probably asbestos protection.  
25 Sheaths. Asbestos blanket.